



## **Montana Fish, Wildlife & Parks**

Region 2 Office  
3201 Spurgin Road  
Missoula, MT 59804-3101  
406-542-5500  
Fax 406-542-5529  
November 9, 2009

Forest Supervisor's Office  
Bitterroot National Forest  
Attn: Travel Planning Project  
1801 N. 1<sup>st</sup> St.  
Hamilton, MT 59840

**Subject: Bitterroot National Forest Travel Management Planning--Draft EIS**

Montana Fish, Wildlife & Parks' (FWP) staff has reviewed the Draft Environmental Impact Statement (EIS) and the Summer and Winter Travel Plan Maps (alternatives) for the proposed Bitterroot Travel Plan, and we offer the following comments.

Generally, FWP supports Alternative 4 with some modifications. We want to see reasonable motorized access maintained that could deliver hunters, anglers and recreationists to trailheads and drainages. Our concern is to not compromise natural resources, water quality and wildlife habitats through expanded motorized trails and roads. Key habitats remain in the Bitterroot but will need protection as human growth and development continue to erode valuable habitats on private lands. This scenario makes protection of public lands paramount to the long-term viability of the numerous native species of fish and wildlife found in the Bitterroot.

Any current level or expansion of motorized OHV trails should be closely tied to an increase in enforcement. User-created trails--especially those into sensitive habitats or riparian areas--are especially detrimental to maintaining a health landscape.

Registered OHVs are allowed on open roads ("open to all vehicles") in the Bitterroot National Forest. Many of these roads are rough and provide areas for riding that are not conducive for general vehicle traffic, but are not counted as miles of roads available for OHV use.

The Wilderness Study Areas (WSA) and Inventoried Roadless Areas are valuable resources and must be evaluated on an individual basis. It may make sense to modify management in some of these areas, but our comments directed below at the "Chain of Lakes WSA" generally apply to all the WSAs and Roadless areas.

### Specific Areas

1. FWP supports the Alternative 4 recommendations year-round in the Jew Mountain, Lick Creek, Flat Creek, Castle Creek, Medicine Tree, Maynard Creek, Little Trapper and Chaffin Creek areas.
2. FWP supports the Alternative 4 year-round restrictions on the Sawmill Saddle motorized use.
3. FWP would support a compromise of allowing existing seasonal motorized use from Ambrose Saddle, north.
4. Also, FWP would ask the Forest to consider a seasonal motorized closure from September 1<sup>st</sup> through June 1<sup>st</sup> on the upper Sawmill Creek Road, in addition to roads 5773, 73643 and 73644 in the Bush and Marten Creeks area.
5. FWP supports the September 1<sup>st</sup> closure for motorized access on trails leading out of the creek bottom in upper Sleeping Child Drainage. Also, FWP supports Alternative 4, including summer and winter motorized use, in this area. A potential compromise would allow motorcycle use only on the trail along the main stem of Sleeping Child Creek (i.e., banning motorized use year-long on all side trails and trails up side drainages, including on White Stallion Trail 1392).
6. FWP brought to the Forest's attention after our 2009 spring elk surveys, what appears as an illegal ATV trail along the top of Barley Ridge. FWP's area wildlife biologist Craig Jourdonnais forwarded that information to the Bitterroot NF district wildlife biologists. We would support the closure of this trail to motorized traffic.
7. FWP encourages the closure of road 4287 yearlong to motorized use or at least from September 1 to July 1 in the Taylor Creek area.

FWP's recommendations are intended to further protect big game winter ranges and reduce movement of big game off public lands toward private land refuges during the early to late fall months.

### Chain of Lakes Wilderness Study Area

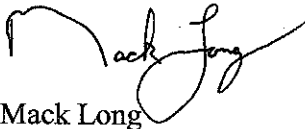
FWP strongly supports the removal of all motorized access in the Chain of Lakes Wilderness Study Area that includes Martin Creek, Moose Creek and associated drainages. This area is a stronghold for several big game species and forest carnivores. This area provides important summer/fall range for moose, elk, bighorn sheep, mule deer, mountain goat, black bear, wolf and mountain lion. Additionally, the lower reaches of these drainages provide winter range for elk, mountain goat and moose specifically. Although each of these species exhibits varying tolerances toward motorized traffic, mountain goats tend to be highly sensitive to motorized

activity, and the proliferation of road access has led to mountain goat declines in Montana, British Columbia, Idaho, Alberta, Washington, and Alaska (Joslin 1986)<sup>1</sup>.

Aside from providing critical habitat elements for wildlife, these large tracts of relatively undisturbed landscapes, from a human activity perspective, create essential linkage zones and movement corridors for wildlife. Removing motorized use from this area will assist in maintaining the overall integrity of this area as important wildlife habitat. Also, removing motorized traffic in this area will help curb the proliferation of user-made (non-system) motorized trails along the Sapphire Divide and the common boundary of the Bitterroot National Forest and the Beaverhead-Deerlodge National Forest.

Thank you for this opportunity to update our previous comments (letter dated 29 Feb 2008) on the Proposed Action for the Bitterroot NF's Travel Management Planning. We appreciate that our recommendations and concerns in our earlier letter have been addressed in proposed Alternative 4.

Sincerely,

A handwritten signature in black ink, appearing to read "Mack Long". The signature is fluid and cursive, with the first name "Mack" and last name "Long" clearly distinguishable.

Mack Long  
Regional Supervisor

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<sup>1</sup> Joslin, G. 1986. Montana mountain goat investigations: Rocky Mountain Front. Final, August 1986. Montana Department of Fish, Wildlife and Parks; Helena.

